

September 12, 2011

Linda Glasier
Stakeholder Coordinator
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Glasier:

I am submitting these comments on the *Draft Scope of the Alternative Assessment Guidance* for the BlueGreen Alliance, a national, strategic partnership between labor unions and environmental organizations dedicated to expanding the number and quality of jobs in the green economy.

First, let me thank you, Dr. Stone and the Department of Ecology for undertaking this important effort. The BlueGreen Alliance strongly supports alternative assessment as a comprehensive and science-based route towards the production of safer chemicals, safer products, healthier people and a healthier environment.

In response to your stakeholder scoping questions:

Our three main observations on the continuum process:

1. The concurrent processes are a wise use of time and resources.
2. The proposed transparency is exemplary.
3. The BlueGreen Alliance strongly supports beginning the continuum process with hazard assessment and including exposure as a secondary tool.

Among the positives this process might bring:

A. Developing a continuum of requirements rather than a fixed and inflexible methodology will allow for the greatest use by the largest variety of chemical users and leave open the opportunity for new information to lead to additional components.

B. A data bank of safer alternatives that were identified using the continuum would allow the project to collect information that could add to the refinement of the process and widen its use more broadly.

The BlueGreen Alliance's only concern for the proposed process is that it be able to move forward and follow its aggressive timeline. This is important work and we applaud you for taking it on.

Sincerely,

Charlotte Brody, RN

Director of Chemicals, Public Health and Green Chemistry